

November 19, 1996

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Before the  
**Federal Communications Commission**  
**Washington, DC 20554**

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In the matter of

**Mass Media Docket No. 87-268**

**Sixth Further Notice of Proposed Rule Making**

Advanced Television Systems and Their Impact Upon the Existing Television Service

**Comments by Humboldt County, Nevada**

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These comments have been prepared by Humboldt County, a local government entity in the State of Nevada, in response to the FCC's Mass Media Docket No. 87-268, Sixth Further Notice of Proposed Rule Making.

Humboldt County operates 36 TV translators and LPTV stations in northern Nevada. 15 of these stations would be affected by a spectrum recovery plan that "reclaims" channels 60 - 69 as proposed in the Sixth Further Notice of Proposed Rule Making. One channel would be displaced by a new DTV allotted channel. One area served by translators would lose all current off-air TV.

The affected stations and communities are:

**K39CX** provides the community of Lovelock with NBC programming from Reno. It would be displaced by the proposed DTV channel assigned to KTVN Channel 2. Despite this station's proximity to Reno, there are other NTSC channels available at this time. However, other displaced stations will be competing for these channels. If channels 60 - 69 are not available it is uncertain if this station can remain on the air.

**K66AF** provides the small town of Imlay with ABC programming from Reno. This station also supplies the input for K47CH which in turn provides inputs for other translators. There are other NTSC channels available in this area, but few of these would be suitable inputs for K47CH and it is likely that none would work as well as channel 66.

**K47CH** provides the Winnemucca area with ABC programming from Reno as well as inputs to 4 translators, some of which provide inputs to other translators. K47CH is located in a densely packed RF environment. Its input, channel 66, has been aggressively protected to insure interference free operation. Any other part of the UHF spectrum at this location is less suitable.

**K69BJ** provides the Denio, Lower Quinn River area with ABC programming from Reno. This station would lose both output (69) and input (K47CH) channels. There are other NTSC channels available in the area and with cooperation from nearby displaced stations, it is likely that K69BJ could find a new output channel. It would still have the problem of no input. This is the only off-air station available to many of its viewers.

**K60AP** provides the Kings River area with ABC programming from Reno. This station would lose both output (60) and input (K47CH) channels. There are currently other NTSC channels available for this station. However, the number of nearby stations that would also be displaced makes it unclear if there would be enough channels to go around. Even if a suitable output channel was available, this station may still not have an input.

**K64AD** provides Golconda with ABC programming from Reno. This station would lose both output (64) and input (K47CH) channels. It's likelihood of staying on the air is similar to K60AP (above).

**K65BL** provides the Valmy, Redhouse area with ABC programming from Reno as well as inputs to other translators which serve viewers in Carlin, Elko and many other communities. This station would lose both output (65) and input (K47CH) channels. This station is one of three stations that provide the only off-air TV in the area. All three would be displaced by the spectrum recovery plan.

**K62EL** provides McDermitt with NBC programming from Boise, Idaho, and provides the input signal for K13EN. If displaced, there are a few NTSC channels available in the area but this station must vie with other displaced stations for this spectrum.

**K13EN** provides NBC programming to the Orovada area and provides the input signal to K04GA. If K62EL could not find a new output channel that would be a suitable input for K13EN, the station would go dark.

**K04GA** provides NBC programming to the Kings River area. It's situation is similar to K13EN (above).

**K61DJ** provides Golconda with CBS programming from Boise and provides the input to K49BK. There are a few NTSC channels available here but other displaced stations would be also be competing for these channels.

**K49BK** provides the Winnemucca area with CBS programming from Boise. This station would lose it's input signal provided by K61BK.

**K67FU** provides Golconda with WWGN programming from Chicago. There would appear to be NTSC channels available here but "Taboo" conflicts, concerns over protecting other translator inputs, and competition with other displaced stations would make this station's future doubtful.

**K69CC** provides the Valmy, Redhouse area with CBS programming from Reno. This station is one of three that provide the only off-air TV in the area. All would be affected by the proposed spectrum recovery plan.

**K63BH** provides the Valmy, Redhouse area with NBC programming from Reno. This station is in the same situation as K69CC (above)

Stations displaced in the area of Saipan Peak and Golconda Summit would have a more difficult time finding a new channel than it would appear at first glance. At least 15 stations would be displaced within 100 miles of these sites (see exhibit 2).

Displaced stations must comply with rules prohibiting co-location of adjacent channels, channels spaced 7, 14, and 15 channels apart, and prohibiting the use of channel 37. Inputs to other translators in the area must also be protected. For example, a translator cannot transmit the same channel that a co-located translator is trying to receive. Often in the case of a translator trying to receive a weak signal, co-located translators must transmit on frequencies at least 2 channels away from the desired weak signal. When you consider these ingredients with the fact that new channels cannot interfere with each other or with any existing non-displaced stations, it is inevitable that some affected stations will not find a usable channel to go to.

Financial considerations will also force some stations to go dark. All of the stations operating in Humboldt County are supported by non-profit tax districts, two of which have budgets barely able to cover operating expenses. Without additional funding they would not be able to pay for new translators or modify old translators. They couldn't pay for new transmit antennas (in many cases new receive antennas, too), improved antenna support structures (new antennas would tend to be larger than the channel 60 - 69 antennas they are replacing) and the engineering and administrative costs associated with finding a new channel.

For tax districts that have adequate funding, there is a demand for more channels, not less. The requirement to apply for new translator and LPTV stations during increasingly infrequent window periods has limited viewing choices in rural areas. New networks such as FOX, UPN, and WB are available for free viewing in cities across the Country. Humboldt County residents are asking why not here? With the arrival of DTV will come a demand for translators to bring this format to rural areas. Combine this need with pent-up demand for the existing new networks and one thing is clear. This is not the time to take spectrum away from television.

Everyone who lives in Humboldt County must watch broadcast TV via a translator or the one LPTV station in Winnemucca. On behalf of our residents we make the following suggestions:

1. Do not take any spectrum away from Television until the NTSC to DTV transition period is complete.
2. Require TV manufacturers to support all current NTSC channels during the transition and for a period of at least 5 years after the transition is complete.
3. Recipients of spectrum taken from Television must be required to compensate displaced stations.

4. The FCC must recognize the need for additional translators to provide DTV signals to rural areas. A current licensee of a translator providing an NTSC signal should be allowed to apply for a second translator for the purpose of carrying the primary station's DTV signal. The licensee should be able to submit applications when needed, or during frequent, regularly scheduled window periods.

In 1986 Humboldt County was forced to spend over \$100,000 to convert six channels down from the high UHF band after these frequencies were allocated to other services. Now 10 years later the FCC proposes to take more channels at a time when additional translators and LPTV stations will be needed to give rural viewers even a fraction of the choices available to their urban counterparts. It isn't logical and it isn't fair.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Burkholder', with a long horizontal flourish extending to the right.

Paul Burkholder  
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Humboldt County  
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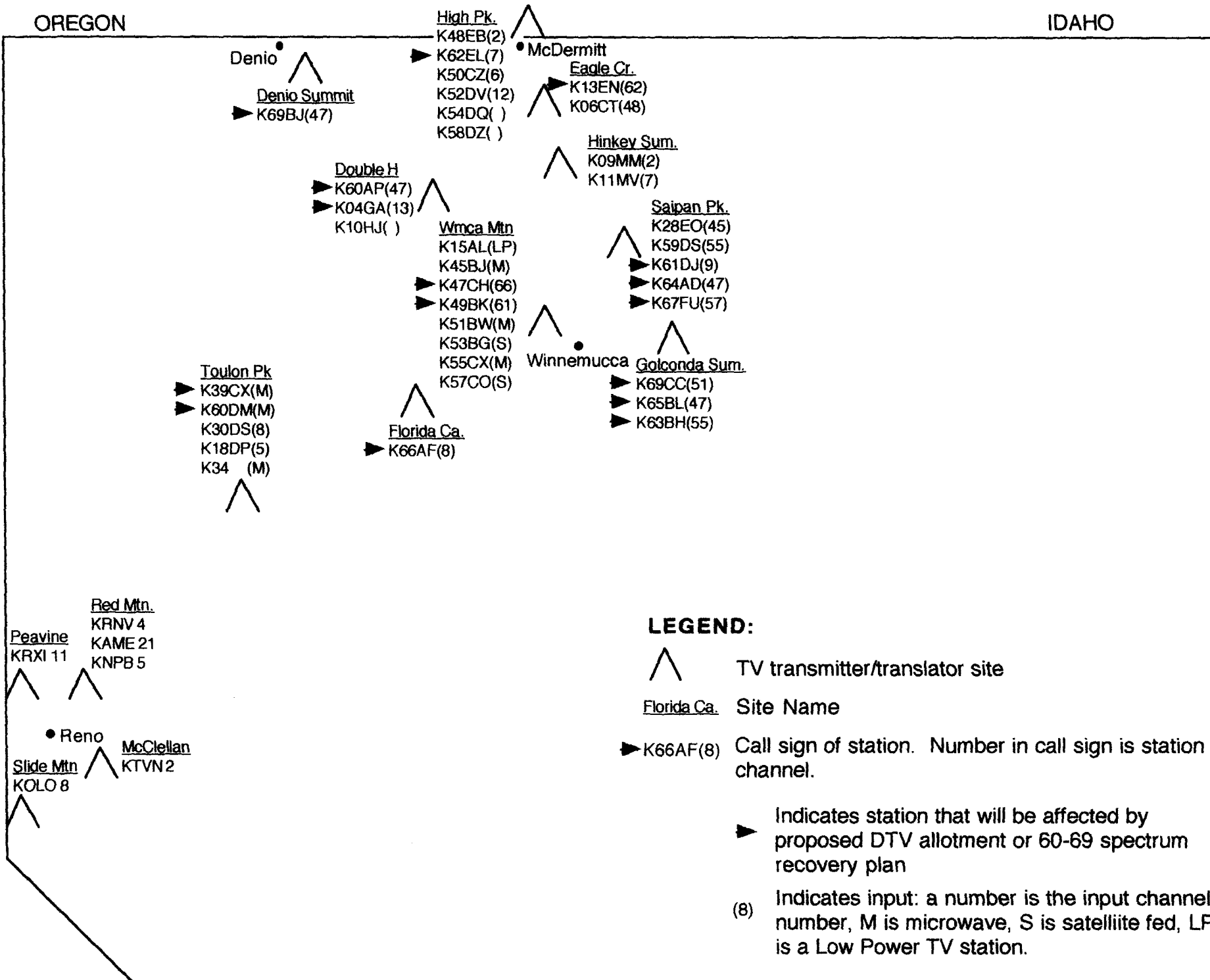
# HUMBOLDT COUNTY TV SITES, PRIMARY STATIONS AND TRANSLATORS

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EXHIBIT 1



## **EXHIBIT 2**

According to the Federal Communications Commission database, the following channel 60 - 69 translators are located within 100 miles of the Saipan Peak/Golconda Summit area:

K60AF  
K60DM  
K60AP  
K61DJ  
K62AE  
K62EL  
K63BH  
K64AD  
K65BL  
K66AF  
K67FT  
K67FU  
K69GN  
K69BJ  
K69CC

This list does not include channel 60 - 69 translators that may be operating in Oregon.